## L.E. Carpenter and Company 33587 Walker Road Avon Lake, Ohio 44012

June 10, 2004

Stephen Cipot
Remedial Project Manager
Emergency and Remedial Response Division
U. S. Environmental Protection Agency
Region II
290 Broadway, 19<sup>th</sup> Floor
New York, New York 10007-1866

Re: L. E. Carpenter Superfund Site, Wharton, Morris County, New Jersey

Dear Mr. Cipot:

This will respond to the letter dated May 18, 2004 requesting that L. E. Carpenter and Company advise you of its willingness to reimburse the \$119,863.96 that the U.S. EPA reportedly has incurred at the above-referenced site since 1989.

- L. E. Carpenter and Company is insolvent, with liabilities at the Wharton site and at certain off-site disposal facilities far exceeding the value of the company's assets, which consist solely of the Wharton, New Jersey properties. Those properties tentatively are to be given to the Borough of Wharton for a new municipal center after a final remediation plan has been approved by the New Jersey Department of Environmental Protection.
- L. E. Carpenter and Company is a third-tier, idle subsidiary of PolyOne Corporation. L. E. Carpenter and Company manufactured vinyl-coated wall coverings at the Wharton facility prior to 1987, but all manufacturing activity at the Wharton facility had ceased before a predecessor of PolyOne acquired any interest in the parent of L. E. Carpenter and Company in 1987. PolyOne and its predecessor have voluntarily funded most of the remediation costs at the Wharton site on behalf of L.E. Carpenter and Company; however, with operating losses in 2001, 2002 and 2003, PolyOne it is not in a position to reimburse the U. S. EPA response costs on behalf of L. E. Carpenter and Company.

Please contact me if you require any further information or have any questions.

Yours truly,

Cristopher R. Anderson

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Director of Environmental Affairs

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